

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities  
LLC and the Chapter 7 Estate of Bernard L.  
Madoff,

Plaintiff,

v.

LION GLOBAL INVESTORS LIMITED,

Defendant.

Adv. Pro. No. 11-02540 (CGM)

**STIPULATION AND ORDER**

Plaintiff Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation proceeding of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the chapter 7 estate of Bernard L. Madoff,

and defendant Lion Global Investors Limited (“Defendant,” and with the Trustee, the “Parties”), by and through their respective undersigned counsel, state as follows:

**WHEREAS**, on June 23, 2023, the Trustee filed a Motion for the Issuance of Letter of Request (Tong Foo Cheong), Motion for the Issuance of Letter of Request (Daniel Chan Choong Seng), and Motion for the Issuance of Letter of Request (Peter Michael Heng) (collectively the “Motions”), *See* ECF Nos. 142-144;

**WHEREAS**, on July 5, 2023, the Court entered a Stipulation and Order adjourning the Hearing on the Motions to August 16, 2023, and extending the Defendant’s opposition to July 28, 2023, and the Trustee’s reply in support of his Motions to August 11, 2023, *See* ECF No. 151;

**WHEREAS**, the Parties are working together in an effort to amend the Letters of Request with language agreeable to both Parties; and

**WHEREAS**, the Parties have agreed to adjourn the Hearing on the Motions and extend the opposition and reply deadlines.

**NOW, THEREFORE, IT IS HEREBY ORDERED THAT:**

1. Defendant’s opposition to the Motions shall be filed and served no later than **August 25, 2023**;
2. Trustee’s reply in support of his Motions shall be filed and served no later than **September 15, 2023**; and
3. The Hearing on the Motions scheduled for **August 16, 2023** shall be adjourned to **September 20, 2023 at 10:00 a.m.**

*[Signatures on the following page]*

Date: July 28, 2023  
New York, New York

By: /s/ Robertson D. Beckerlegge  
**Baker & Hostetler LLP**  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
dsheehan@bakerlaw.com  
Robertson D. Beckerlegge  
Email: rbeckerlegge@bakerlaw.com  
Eric R. Fish  
Email: efish@bakerlaw.com

By: /s/ Ehud Barak  
**Proskauer Rose LLP**  
11 Times Square  
New York, New York 10036  
Telephone: (212) 969-3000  
Facsimile: (212) 969-2900  
Ehud Barak  
ebarak@proskauer.com  
Russell T. Gorkin  
rgorkin@proskauer.com  
Elliot R. Stevens  
estevens@proskauer.com

*Attorneys for Irving H. Picard, Trustee for  
the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff  
Investment Securities LLC and the  
Chapter 7 Estate of Bernard L. Madoff*

*Attorneys for Defendant Lion Global Investors  
Limited*

**Dated: July 31, 2023**  
**Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris**  
**U.S. Bankruptcy Judge**